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Marlene H Dortch
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Basic Service Tier Encryption; Compatibility Between Cable Systems and Consumer Electronics Equipment, MB Docket No. 11-169, PP Docket No. 00-67

Dear. Ms. Dortch:

On June 27, 2012, Lisa Rosenblum, Yvette Kanouff, Catherine Bohigian and Michael Olsen of Cablevision Systems Corp. had a telephone conference with the following Commission staff to discuss the above-captioned proceeding: Bill Lake, Nancy Murphy, Steve Broeckaert, Alison Neplokh, and Brendan Murray of the Media Bureau.

Cablevision has successfully encrypted the basic service tier in its New York City System in 2010. Encrypting the basic service tier enables consumers to connect and disconnect service without service calls and reduces operational costs associated with installing traps. These savings increase customer convenience and improve the environment.

As operators provide their video services on more devices, securing content continues to be important, and the ability to encrypt all content – including the basic service tier – is paramount to providing the kind of assurances to rights holders that go hand in hand with broader service delivery capabilities. Rights holders are spending more time scrutinizing how operators are protecting their content.

The approach to encryption must be compatible with the changing form of video delivery by cable operators. Cablevision is evolving away from a reliance on set top boxes toward a cloud-based delivery system of its products and services, such as the Network DVR and its "apps," which already provide the entire Cablevision content experience to consumers' PCs, Macs, smartphones, and tablets. In the move towards HTML5, Cablevision recently demonstrated an off the shelf SmartTV by Samsung and LG running the Cablevision application at the NCTA show. Since HTML has no knowledge of non-web set-tops (channel tune, overlays, etc.), Cablevision is actively working to bridge the gap between HTML5 and television, such that its future video

service can be all web centric and cloud based. Cablevision is leading in this area, embracing open and web centric solutions.

The drive toward open, "cloud based" delivery de-emphasizes in-home, proprietary devices like set top boxes and digital to analog converters, facilitating the ability of consumers to use third party devices they already have in their home to reach Cablevision content directly.

Accordingly, Cablevision urges the Commission not to pursue additional hardware requirements as a precondition to encrypting the basic service tier. Further requirements to design and support legacy devices would be a step backward for both operators and consumers, as they seek to enjoy more services on more devices *without* set top boxes.

Further, permitting cable operators to encrypt digital, basic programming without imposing new hardware requirements poses no hardship to the market for smart "edge" devices. These devices – supporting a variety of operating systems including iOS, Android, Mac OS, and Windows -- are largely already capable of downloading and running operator supplied, secure "apps" that access programming content. Other, nonstandard devices can either use a cableCARD or use our downloadable security to get access to secure content. These new, capable edge devices will benefit substantially from the evolution away from proprietary hardware in the home.

Very truly yours,

cc: Bill Lake
Michelle Carey
Nancy Murphy
Alison Neplokh
Steve Broeckaert
Brendan Murray